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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N. W. - Room 222
Washington, D. C. 20554

Re: Ex parte, CC Docket No. 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

Dear Mr. Caton:

Today, in response to the Commission's July 31, 1997 Request for Information ("RFI") regarding central office code openings, James Bolin, Anthony Keuper and the undersigned, all of AT&T, participated in a conference call with Renee Alexander and Gregory Cooke of the Common Carrier Bureau's Network Services Division. On the conference call, AT&T discussed the tentative definitions outlined in the RFI and presented its views on the functions and charges associated with the opening of central office codes. Our discussion is summarized below.

AT&T generally agrees with the tentative definitions offered in the RFI. However, the terms "activation of CO codes" and "CO code opening" are used interchangeably by industry participants to cover the functions the RFI attributes to both terms, and it therefore could lead to some confusion to assign different meanings to these phrases.

AT&T believes that the terms addressed in the RFI should be defined as follows:

Assignment of CO Codes: The first step in the process by which carriers are provided with central office, or "NXX," codes. This function is well-defined in the INC Central Office Code Administration Guidelines, which are part of the record of this proceeding.

The CO code administrator (the dominant LEC within an NPA) sets aside NXX codes for certified carriers on a first-come first-serve basis, or according to any jeopardy procedures that may be in place (e.g., by lottery or other rationing measures). The CO code administrator is then charged with keeping track of which carriers are assigned which NXX codes. This function also should include forecasting to anticipate and avoid

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potential jeopardy situations. The tasks associated with CO code assignment will be taken over by the new NANP Administrator no more than 18 months after that entity assumes its duties.¹

At bottom, code assignment is a simple record-keeping function that can be accomplished using a PC database or spreadsheet. Any CO code administrator charges for this service therefore should be *de minimis*, and might well be exceeded by the cost of billing and collecting them.

Activation Of CO Codes and CO Code Opening: These terms generally are used interchangeably by industry participants to refer to functions that can be grouped into two categories: i) those for which Bellcore is chiefly responsible in its role as numbering administrator, and ii) those performed by carriers in order to be able to route calls on their own networks.

i) Bellcore maintains the Local Exchange Routing Guide ("LERG") and related databases which are a master record of NXXs in operation on the PSTN. In order to open a new CO code, certain well-defined information must be updated in the LERG. These updates can be performed by Bellcore, or by carriers themselves. (AT&T, for example, has its own link to Bellcore for these purposes.) Bellcore charges carriers for access to the LERG and for updating the information resident there. These Bellcore functions also will be assumed by the new NANPA.

There do not appear to be any functions associated with this aspect of code opening for which it would be appropriate for a LEC acting as CO code administrator to charge a fee, with the possible exception of situations in which a carrier requesting an NXX engages the administrator to interface with Bellcore on its behalf.

ii) On a monthly basis, Bellcore makes available updated LERG information. All carriers on the PSTN then have 15 days in which to update the translation tables in their switches, and to alert other OSSs in their network as necessary that a new NXX is valid. With the possible exception of some antiquated equipment, updates to carriers' translation tables are software-only changes that generally can be completed within 24 to 48 hours. When a new CO code is activated in any NPA, all carriers on the PSTN must update their translation tables in order for customers on their networks to be able to complete calls to, or receive calls from, that NXX.

¹ See Report and Order, Administration of the North American Numbering Plan, CC Docket No. 92-237, 11 FCC Rcd. 2588 (1995), ¶ 115.

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There should be no charges to the carrier receiving a new CO code associated with these functions. Translation table updates and similar systems modifications are an essential component of providing telecommunications services, and must be conducted on a monthly basis by all facilities-based carriers. Any costs associated with this routinized, software-based task should be minimal, and in any event should simply be deemed a "cost of doing business." Moreover, carriers historically have not sought to recover any costs associated with modifying their own systems to recognize new NXXs. Indeed, if such charges ever were levied, they would have to be imposed by every carrier in the nation whenever an NXX is opened anywhere on the PSTN.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Sincerely,

A handwritten signature in black ink, appearing to read "F. J. Simone". The signature is fluid and cursive, with the first name "F. J." and the last name "Simone" clearly distinguishable.

cc: R. Alexander
G. Cooke